

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

**SANDRA COLLINS**

**Plaintiff,**

**V.**

**WALMART STORES EAST, LP**

**and/or JOHN DOES**

**DEFENDANT (S).**

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**FILE NO. 4:22-cv-00057-SCJ**

**AMENDED COMPLAINT FOR DAMAGES**

COMES NOW the Plaintiff SANDRA COLLINS in the above matter who files this amended complaint for damages by adding WALMART STORES EAST, LP as a party Defendant and substituting said Defendant for WALMART, INC and WARES DELAWARE CORPORATION, upon showing the following:

-1-

The Defendant WALMART STORES EAST, LP is subject to the jurisdiction and venue of this court as it maintains a place of doing business in Gordon County, Georgia.

-2-

The Plaintiff SANDRA COLLINS shows that she drove her vehicle to the Walmart Store (store number 658) located at 2510 Redmond Circle, NW in Rome,

Georgia on the 5<sup>th</sup> day of March, 2020 and parked her vehicle in the parking lot of said premises at approximately 8:00 p.m.

-3-

The Plaintiff SANDRA COLLINS shows that the Defendant WALMART STORES EAST, LP is the owner and operator of aforesaid store and parking lot at 2510 Redmond Circle Rome, Ga.

-4-

The Plaintiff SANDRA COLLINS shows that she went to said WALMART STORES EAST, LP premises that evening with the intention of going inside to purchase items she needed at home.

-5-

As the Plaintiff SANDRA COLLINS exited and walked around her vehicle, the Plaintiff SANDRA COLLINS stepped on a rag obscured by her vehicle that slid and caused her to fall to the ground.

-6-

The Plaintiff SANDRA COLLINS shows that the aforesaid debris created a hazard and increased risk of falling which is what happened to the Plaintiff.

-7-

The Plaintiff shows that WALMART STORES EAST, LP may have conveyed ownership of aforesaid property and/or may have contracted with other entities for the inspection, monitoring, cleaning and maintenance of the subject premises that are unknown to the Plaintiff and who cannot be identified without further discovery who may be added later as Defendants.

-8-

The Plaintiff SANDRA COLLINS shows that the Defendants had a duty to inspect its premises and keep its premises safe, free and clear of debris that poses a hazard and increased risk of falling.

-9-

The Plaintiff shows that the Defendants breached their duty to her and other customers by failing to reasonably inspect said premises and by failing to keep said premises clean and clear of debris that posed an increased risk of falling.

-10-

As the direct and proximate result of the Defendants' negligence as set forth above, caused the Plaintiff SANDRA COLLINS to sustain injuries to her knees back and spine, including aggravation of pre-existing conditions, that required prolonged medical attention and treatments.

-11-

As the direct and proximate result of the Defendants' negligence, the Plaintiff has sustained and/or will sustain damages in the form past, presents, and future medical expenses.

WHEREFORE, the Plaintiff SANDRA COLLINS prays that she have and recover from the Defendant WALMART STORES EAST, LP and any OTHER JOHN DOE Entity all damages provided by law, including, but not limited to:

- a. Past, present and future medical expenses;
- b. Past, present and future physical pain, suffering and impairment;
- c. Past, present and future mental pain, suffering and impairment;
- d. Past, present and future loss of wages and/ or diminished capacity to labor;
- e. All other damages as provided by law.

Respectfully submitted, this 4th day of March, 2022.

/s/Rodney L. Mathis  
**Rodney L. Mathis**  
**GA State Bar No. 477043**  
**Attorney for Plaintiff**

**P.O. Box 1718**  
**Calhoun, GA 30703-1718**  
**(706) 629-9351**

**CERTIFICATION OF FONT COMPLIANCE**

Counsel for Plaintiff hereby certifies that the foregoing has been prepared with one of the font and point selections approved by the Court in LR 5.1(B): Times New Roman (14 point).

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing AMENDED COMPLAINT FOR DAMAGES has been served via Court's electronic mailing system to the following:

DREW ECKL & FARNHAM, LLP  
Leslie P. Becknell  
777 Gloucester Street, Suite 305  
Brunswick, Georgia 31520

Douglas G. Smith, Jr.  
303 Peachtree Street NE, Suite 3500  
Atlanta, Georgia 30308

This 4th day of March, 2022.

**/s/RODNEY L. MATHIS**  
**RODNEY L. MATHIS**  
**GA State Bar No. 477043**  
**Attorney for Plaintiff**

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